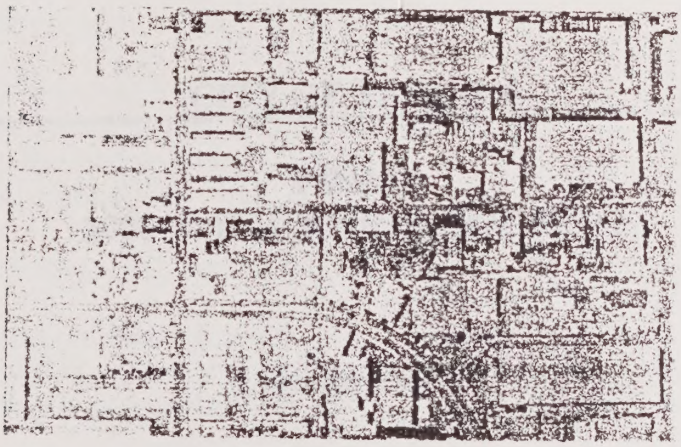
2004 0620

CITY OF VERNON



FINAL
2000-2005 Housing Element

February 2001

CITY OF VERNON

FINAL
2000-2005 HOUSING ELEMENT

February 2001

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HOUSING ELEMENT

1.0 INTRODUCTION

Vernon is located near the geographic center of Los Angeles County. The City is bounded on the north and west by Los Angeles, on the east by Commerce and Bell, and on the south by Huntington Park and Maywood. Vernon is three miles southeast of downtown Los Angeles (Figure H-1), and 15 miles north of major harbor and port facilities in San Pedro and Long Beach.

As in any city with much industry and many jobs, the City of Vernon must be concerned with housing. Proximity of housing to jobs is important to both employers and employees. The availability of adequate housing is an important aspect of planning for the long-term viability of the City and its businesses.

1.1 State Requirements

The California Government Code is very specific concerning the preparation and content of a housing element. It is the only element which must be reviewed by the State for completeness and compliance with the law before it is adopted. The element examines existing conditions and, through analysis, identifies housing needs and presents programs to meet those needs. The legislature has deemed that the Housing Element is the appropriate mechanism to implement State-wide goals regarding the provision of decent and suitable housing for all persons. The Government Code also makes it clear that the provision of affordable housing is the responsibility of all local governments and that they, using vested powers, should make a conscious effort to see that there are housing opportunities for all income groups (Section 65580). The intent of the State housing element requirements is based on the following concerns (Section 65581):

1. Local governments should recognize their responsibilities in contributing to the attainment of the State's housing goals;

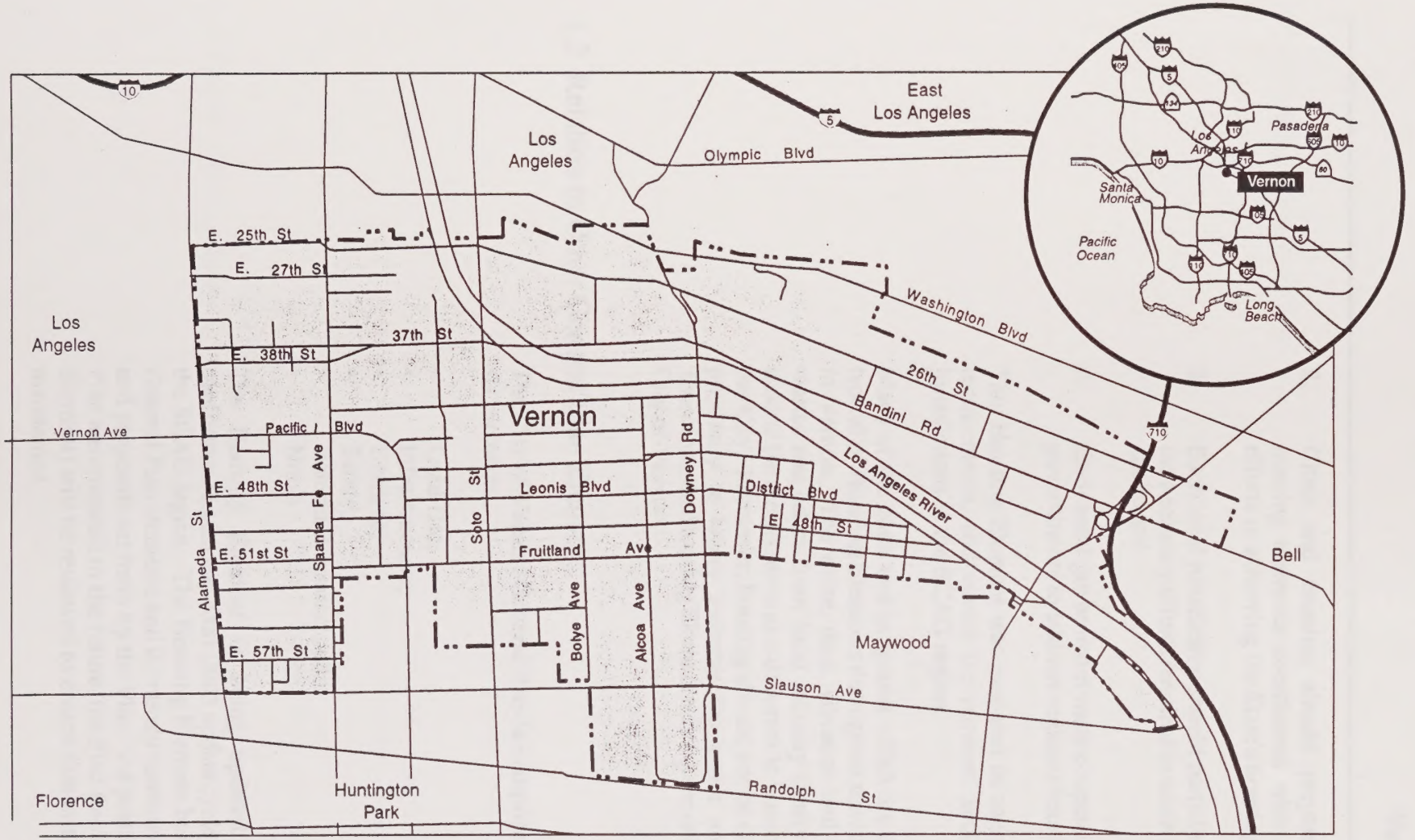


Figure H-1
Regional Location

Housing Element 2

2. Cities and counties should prepare and implement housing elements coordinated with State and federal efforts in achieving the State's housing goals;

3. Each local jurisdiction should participate in determining the necessary efforts required to attain the State's housing goals; and

4. Each local government must cooperate with other local governments to address regional housing needs.

This Housing Element was prepared in compliance with State requirements, and covers the required 2000-2005 period for jurisdictions in the SCAG region.

Many of the goals and programs which are desirable and even typical of Housing Elements throughout the state are not feasible in Vernon. The noise, dust, vibration and toxic or chemical wastes and odors from local industry (many of which operate around the clock) serve as a deterrent to housing development in the City. Moreover, housing should not be encouraged in close proximity to heavy industry for health and safety reasons. Therefore, the Housing Element reflects the unique realities of the City of Vernon.

1.2 Relation to Other General Plan Elements

The City of Vernon General Plan is comprised of the following six elements:

- Land Use;
- Infrastructure;
- Housing;
- Safety;
- Natural Resources; and
- Noise.

The Housing Element is being updated at this time in conformance with the 2000-2005 update cycle for jurisdictions in the SCAG region. The Housing Element builds upon the other General Plan elements and is entirely consistent with the policies and proposals set forth by the Plan. As portions of the General Plan are amended in the future, the Plan (including the Housing Element) will be reviewed to ensure that internal consistency is maintained.

1.3 Sources of Information

The City of Vernon consists of a single Census Tract, 5324.00. Within Census Tract 5324.00, three Block Groups (BG 2, BG 4, and BG 9), fall within the city limits. The 1990 census originally incorrectly attributed Census Tract 5323.01, BG 7 to the City of Vernon, as well as seven units within Census Tract 5324 BG 2 which fall outside the City limits. The City requested a revision from the Census Bureau, and subsequently received an adjustment to its housing unit and population totals (30 housing units, 82 population - refer to Appendix A hereof for a copy of the Census Bureau letter). However, the Census Bureau did not revise the detailed housing and population characteristics for the City of Vernon. Therefore, the analysis contained in the Housing Element which is derived from the 1990 census is conducted at the block group level, and is adjusted herein to the City's correct population and housing unit totals (31 units, 95 population). In addition, because of the City's extremely limited housing stock, combined with the fact that the City owns 26 of these units, original data from the City on housing characteristics is utilized where available in place of the census.

The following documents serve as supplemental material to the Vernon Housing Element and represent background reference material supporting this Element and are incorporated by reference:

1. City of Vernon RHNA Appeal letter (addressed to Zev Yaroslvsky, SCAG Regional Council President), January 13, 2000

2. Population, Household, and Employment-2010-2025 forecasts for Gateway Cities COG Subregion, February 9, 2000.

3. Housing market and conditions information is provided by the City.

1.4 Public Participation

Section 65583 (c)(6)(A) of the Government Code states, "The local government shall make a diligent effort to achieve public participation of all economic segments of the community in the development of the housing element, and the program shall describe this effort."

The City Council has not created a separate Planning Commission, so that all public hearings are conducted before the Council.

For purposes of this Housing Element, community residents will be provided the following opportunities to review and comment on the Draft Element prior to adoption. The Draft Element will be available for review in the City's Community Services Department, and will be provided to adjacent jurisdictions and placed in local libraries. Copies will be made available on request to any person at a nominal charge. Upon receipt of comments from the State Department of Housing and Community Development on the Draft Element, the City Council will conduct a public hearing on the Element. Notice will be published in the local newspaper, will be posted in the City, and will be mailed to those who have a request for notice on file in advance of the hearing.

2.0 HOUSING PLAN

2.1 Summary of Housing Needs

Population and Housing Trends

City records indicate Vernon's housing stock and related resident population base has undergone little change since 1980. The City had a 1980 housing stock of 35 dwelling units, supporting a resident population of 85 persons. Only one residential unit has been constructed since that time. Several substandard residential units have been removed from the housing stock, including three units in 1984, one unit in 1985, and one in 1992, bringing the current unit count to 31. These housing units are located in pockets throughout the City, although most are located west of Downey Road. Since 1980, the resident population has ranged between 77 and 95 persons, with the current population estimated by the City to be between 90-95 persons.

The Gateway Cities Council of Governments (COG), of which Vernon is a part, has developed population, housing and employment forecasts through the year 2025. These forecasts have been developed as part of the subregion's input to SCAG for the Regional Comprehensive Plan. As illustrated in Table H-1, Vernon's housing stock is projected to remain at a constant 31 units, while population is expected to marginally increase to 98 persons by the year 2010, as family composition changes and housing units turn over through time.

Table H-1
City of Vernon
Projected Population and Housing Growth
2000-2025

2000		2010		2020		2025	
Population	Housing Units	Population	Housing Units	Population	Housing	Population	Housing
90-95	31	98	31	98	31	98	31

Source: Gateway Cities COG Report, 2/09/00

Housing Characteristics

Households

In 2000, the City has documented a total of 28 households or occupied housing units (see Table H-2) with a resident population estimated at 90 to 95 persons. Average household size is 3.4 persons per unit. The housing stock is not projected to decline over the next twenty years, and any growth in population will be nominal. The City does not expect to experience any increase in the number of persons per household. Housing vacancy is low in the City, with only three units currently unoccupied.

Table H-2
Housing Characteristics
2000

Total Housing Units	31
Occupied Units/Total Households	28
Average Household Size	3.4
Family-Headed Households	20
Total Population	95

Source: City of Vernon, Community Services Department, November, 2000.

Table H-3 presents City-collected data on housing tenure (owner/renter) and housing units per structure. Of the total 31 housing units in Vernon, 25 are renter occupied, three are owner occupied, and three are vacant. Compared with the statewide figure of 45 percent, Vernon has a significantly higher proportion (89 percent) of renter households. The majority of Vernon's housing stock is comprised of single family dwellings, with only one apartment building located in the City. The City owns 84 percent of the total housing stock: 26 dwelling units, 18 of which are single family dwellings and one of which is an 8-unit apartment building. The City rents most of these units to public safety personnel, such as fire, police, street maintenance, and utility operators, to ensure the availability of such personnel in case of emergency.

Table H-3
Units in Structure/Housing Tenure
2000

	Total	Owner Occupied	Renter Occupied	Vacant Units
Total Housing Units	31	3	25	3
Detached Single Family	19	1	15	3
Attached/Non-Residential	2	1	1	0
Duplex	2	1	1	0
Apartments	8	0	8	0
Mobile Home	0	0	0	0

Source: City of Vernon, Community Services Department, October 2000

Housing Condition

A windshield survey was conducted in 1996 of Vernon's housing stock to assess housing conditions. Although the housing stock is older (largely built before 1950), it is in generally good repair. The survey determined that all 31, or 100% of the housing stock in Vernon, are well maintained and in good condition. One unit which had fallen into disrepair, was demolished by its owner in 1992. A major reason for the unusually good quality of housing conditions in Vernon is the City's ownership of 84 percent of the housing stock, and responsibility in maintaining these units. Upon vacancy of a City-owned housing unit, the City conducts any needed repairs and upgrades. The great demand for industrial space in the City means that unnecessary or poorly maintained units are unlikely to remain unless acquired by the City.

Housing Affordability

Because the City's resident population is so small, its household needs are negligible when traditional needs analysis methods are applied. According to 1990 census data, one-third of the family households in Vernon have low (80 percent MFI) to very low incomes (50 percent MFI) in comparison to Los Angeles County median household income of $38,000 for the same period. However, due to the fact that the City owns and rents most of the housing at unusually low monthly rents, housing overpayment is very limited. City-owned apartments and houses rent at levels

affordable to very low income (50% MFI) households. Rental rates are well below the maximum affordable rents established by HUD for assisted housing in Los Angeles County which are summarized in Table H-4 Income and Rent Limits for Assisted Housing. Nevertheless, using State and Federal standards for housing overpayment of more than 30 percent of gross monthly income, 1990 census data indicated housing overpayment by four households within the City. However, based on the City's knowledge of the income levels of public safety personnel occupying City-owned units, it would appear that households located outside of the city limits but included in 1990 census statistics for Census Tract 5324.00, BG2 may have incorrectly skewed this data.

Table H-4
Income and Rent Limits for Assisted Housing
HUD Fiscal Year 2000

Family Size	Very Low Income	Low Income	Moderate Income
Occupancy Income Limits			
Small Family (3 persons)	$23,450	$37,500	$56,250
Large Family (5 persons)	$28,150	$45,000	$67,500
Maximum Rent			
Small Family (3 persons)	$486	$838	$1,306
Large Family (5 persons)	$554	$975	$1,538

Notes: Very Low Income = 50% of LA County median income; Low Income = 80%; Moderate Income = 120%.
Los Angeles County median income for family of four - $52,100 (3-00). Published by HUD.
Rents include $100/month utility costs for small families, $150/ month for large families

Special Needs Groups

Certain segments of the population may have a more difficult time finding decent, affordable housing due to special circumstances. The Housing Element is required to evaluate the following special needs households: elderly, handicapped persons, large families, female-headed households and the homeless. Due to the small size of the City's total resident population, the magnitude of households in Vernon with special needs is very small.

Elderly

The special needs of many elderly households result from their lower, fixed incomes, physical disabilities, and dependence needs. Vernon currently has an estimated nine residents age 65 or above, representing 10% of the total population. The proportion of elderly persons in Vernon is likely to remain low as the majority of the City's limited housing stock is occupied by working-age, public safety personnel.

Handicapped

As of November 2000, City data indicates that two persons living in Vernon have disabilities which would likely affect their housing needs. The City's heavily industrial environment presents added constraints to the handicapped. Large volumes of street and rail traffic, and delays caused by trains and parked trucks additionally limit the maneuverability of handicapped individuals. In order to address the needs of its handicapped residents and employees, the City enforces requirements for handicapped accessibility in new construction, and has undertaken a program to install curb ramps for wheelchairs. The City will continue in its efforts to provide equal access to jobs and public facilities for the handicapped.

Large Families/ Overcrowding

Large families are identified as a group with special housing needs based on the limited availability of adequately sized, affordable housing units. Large households are often of lower income, often resulting in the overcrowding of smaller dwelling units and in turn accelerating unit deterioration. Current (2001) City data indicates that four of the total 28 occupied households in the City had 5 or more members. The City's industrial character presents similar disadvantages for families with children as it does for the handicapped. Access to residential services, such as education, recreation and local retail goods and services, is along roadways with high levels of truck traffic, railroad crossings and loading activities. These conditions make pedestrian access to residential service facilities difficult and unsafe, particularly for children.

In terms of household overcrowding (defined as greater than 1.01 persons per room), a current (2001) occupancy survey identifies only one overcrowded unit among the 28 occupied households in the City. While this particular unit meets the census definition of

overcrowding, it is not considered severely overcrowded as it has four separate rooms with five occupants. Household overcrowding is not a significant issue in Vernon, due in large part to the limited presence of large family households, and City ownership of the majority of the housing stock.

Female-Headed Households

Female-headed households tend to have low incomes, thus limiting housing availability for this group. 1990 census data indicated that there is one female-headed household in the City. The housing needs of female-headed households of lower income can be addressed through the continued provision of affordable housing, as well as through affordable day care options.

Homeless

Throughout the country, homelessness has become an increasing problem. Factors contributing to the rise in homelessness include the general lack of housing affordable to low and moderate income persons, increases in the number of persons whose incomes fall below the poverty level, reductions in public subsidy to the poor, and the de-institutionalization of the mentally ill. City records indicate that there are few homeless persons or families in Vernon. This is likely due to the City's industrial environment, and its lack of social and residential services.

Because there are few homeless in Vernon, the development of a separate emergency shelter is not warranted. If necessary, the City can address the needs of homeless in the area by supporting nearby shelters such as the Salvation Army shelter located in the adjacent City of Bell. The Bell shelter is a regional emergency shelter offering overnight accommodations and other services to the homeless. The shelter provides a daily shuttle service to its facility, with pick ups at the Salvation Army headquarters in Huntington Park, Hollywood, East Los Angeles, Compton and Long Beach. Services provided include overnight lodging, food, and use of shower and laundry facilities. These emergency services are available to homeless individuals and families on a per night basis, with the shelter able to accommodate a total of 250 persons.

Future Housing Needs

State law requires jurisdictions to provide for their fair share of regional housing needs. The Southern California Association of Governments (SCAG) determines the projected housing needs for jurisdictions in Southern California, and designates the number of

households the City will be expected to accommodate during this period. Future housing needs reflect the number of new units needed in a jurisdiction (future demand), plus an adequate supply of vacant housing to assure mobility and new units to replace losses. These needs were forecast by the (2000-2005) Regional Housing Needs Assessment (RHNA), which considered on a regional and local level: market demand for housing, employment opportunities, availability of suitable sites and public facilities, commuting patterns, type and tenure of housing need, and housing needs of farm workers. In November, 2000, SCAG adopted the final 2000-2005 RHNA which included a future housing need of zero (0) in the City of Vernon, consistent with the City's RHNA allocation for the 1989-1994 period. Future housing growth has been deemed inappropriate in Vernon due to the City's pervasive industrial environment, and land use incompatibilities related to hazardous materials storage and processing, background contamination, noxious odors, noise pollution, and truck and railroad traffic.

While the City's environmental conditions have precluded requirements for future housing development in Vernon, the City will accommodate residential development to the extent necessary to support local industry and public safety personnel. Major environmental constraints preclude other types of housing.

Energy and Water Conservation

Compared with the City's energy-intensive industries, housing consumes only a very small proportion of the City's total energy consumption. The City utilizes Title 24 energy standards for residential construction to minimize energy consumption. Necessary sound insulation on residential units also results in effective heat insulation, thus reducing energy usage. Power is provided by the City through its electric system. The Southern California Gas Company provides fuel for most heating needs, and offers programs for water heater insulation, attic insulation, and water flow limiting devices.

City water is provided to all dwelling units either from ground water or by import from the Metropolitan Water District. Compared to the City's large industrial users, residential water use is minimal, and no special conservation steps have been deemed necessary.

2.2 Constraints on Housing Development

Governmental Constraints

The City's zoning ordinance imposes some constraints on housing. However, new residential development is permitted anywhere in the City. Because of the industrial nature of the City, health and safety codes may also constrain housing location or siting.

New attached and detached residential units are permitted throughout the General Industry and Commercial-Industrial zones. Residential dwelling unit standards for single family detached units include 5,000 square foot minimum lot size, maximum two stories or 35 feet in height, and a one-car garage minimum per dwelling unit. Standards for multiple-family units include minimum 4,000 square foot lot size per dwelling, maximum three stories or 45 feet in height, and at least one garage space per dwelling unit plus additional parking at one space for each two units. Residential uses are required to be equipped with air conditioning and sound insulation to protect residents from exposure to adverse environmental conditions. New housing is permitted in the Heavy Industry zone as a conditional use, subject to more stringent standards to ensure land use compatibility. The zoning ordinance permits a temporary residential unit (not to exceed 180 days) related to construction upon the same lot, and in addition allows an attached residential unit on the premises of a non-residential use, business, plant or facility to house an owner, caretaker, guard or night watchman. While Vernon seeks to retain its industrial orientation, it specifically permits residential uses in the City.

The City's permit processing fees and procedures do not unreasonably constrain residential development. Fees are comparable to those within the region, and have been set at a level necessary to cover the costs to the City.

Non-governmental Constraints to Housing

In Vernon, there is virtually no land available which would be suitable for the development of housing. Although the current inventory of unimproved or underutilized sites identified 17 sites, serious environmental conditions render these sites unsuitable for residential development. Selected sites are discussed in detail in Section 2.3. Environmental factors affecting potential residential development are related to hazardous materials storage and processing, background contamination, noxious odors, noise pollution, and truck and railroad traffic generated by the City's pervasive industrial land uses. Inadequate access to residential

services is an additional constraint to residential development in the City. These factors which tend to preclude the use of land for residential purposes in Vernon must be considered in establishing where housing might be located in the City.

Hazardous Materials

With a history as an industrial City, Vernon's heavy and prolonged industrial use is reflected in the following conditions (refer to Figure H-2):

- A high concentration of both underground (45 facilities with 127 underground storage tanks) and above ground hazardous material storage tanks throughout the City.
- Within the City, 555 business handle/store hazardous materials.
- Numerous underground pipelines throughout the City, many carrying potentially explosive materials.
- Residual soil contamination resulting from prior manufacturing activities on the site and from previously abandoned chemical waste open disposal pits, aeration ponds, landfills or petroleum related activities. (A high lead content in the soil is common.) Twenty sites are on the State hazardous waste Superfund List, with one additional site on the Federal hazardous waste Superfund List.
- Approximately 137 miles of railroad track historically treated with herbicides for weed control. Right-of ways show patterns of contamination from spilling, overfilling or transfer of chemicals.
- Six California EPA-permitted hazardous waste treatment, storage and disposal facilities.
- Ten closed landfill sites.

Overfilling storage tanks, leaking pipes and leaking tanks have resulted in residual soil contamination in Vernon. Sixteen sites have been declared Proposition 65 sites (determined by laboratory tests to have excessive chemical contamination). Remediation plans are required to decontaminate the soil.

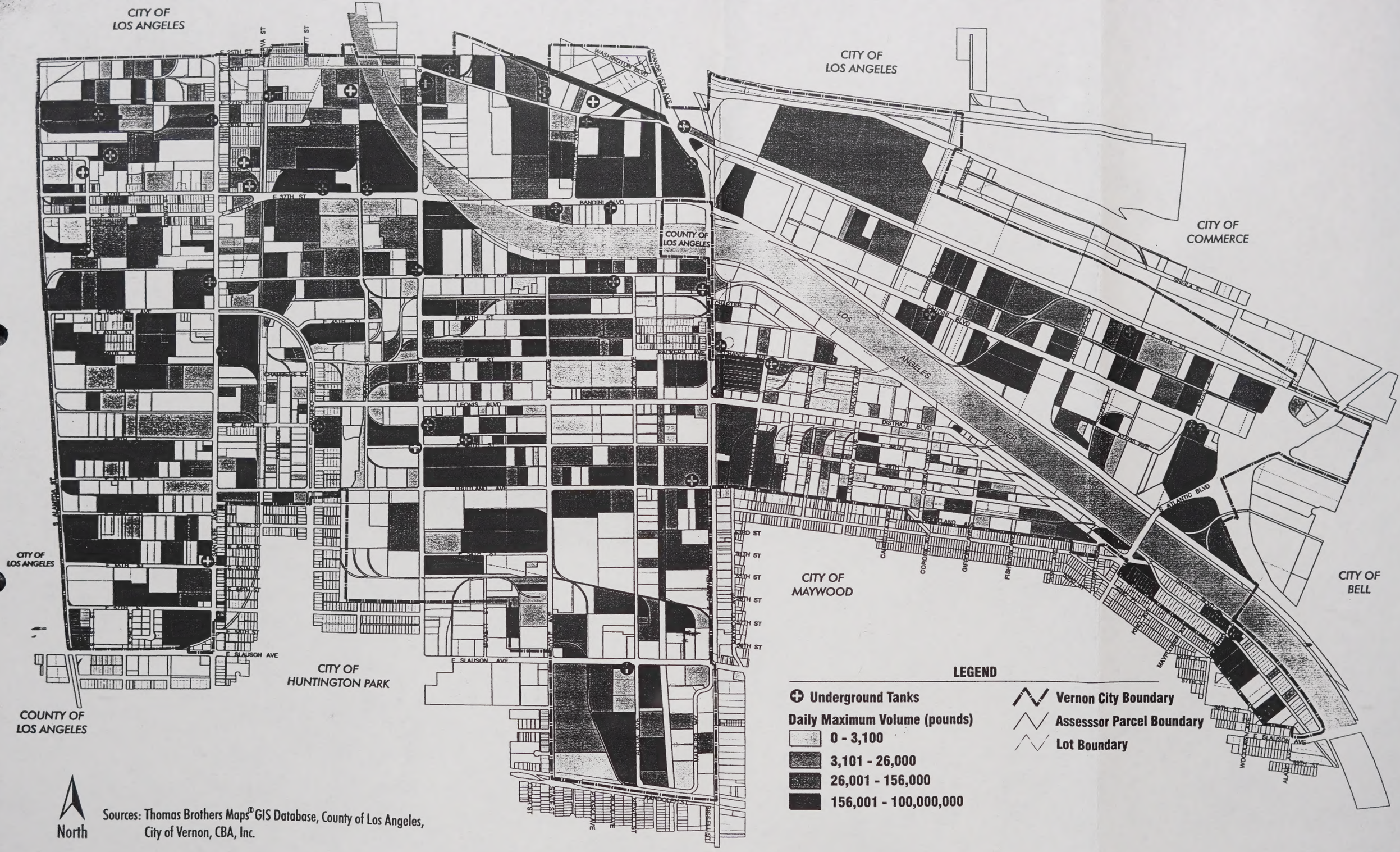


Figure H-2
Hazardous Materials Sites

Due to high background and other petroleum contamination and lack of feasible clean-up options, several sites were remediated with covenants being recorded to advise future purchasers of the presence of contamination, and due to public health concerns, these sites would be unsuitable for future sensitive land uses such as housing.

Due to the high concentration of underground storage tanks in Vernon, (45 facilities with 127 underground storage tanks are currently in the City), there is significant potential for chemical spills or accidents. The City's Underground Tank Program has resulted in the removal of 1,123 tanks on 255 sites since May 1984. Additionally, where structures were threatened by tank removal, 68 underground tanks were abandoned in place.

Another component of hazardous materials control in Vernon is the "right to know" program. All businesses in the City are required to submit inventories of all hazardous materials used or stored. The City has 555 businesses that handle or store hazardous materials. Figure H-2 shows the maximum daily volume (in pounds) of hazardous materials for each business. The total number of businesses is distributed evenly among the four volume ranges. As shown on Figure H-2, businesses with very high maximum daily volumes (156,001 to 100,000,000 pounds) are located throughout the City. The risk of upset from businesses handling such high volumes of chemicals, many of which are toxic, is a factor which must be considered in land use planning.

The locations of businesses throughout the community with underground storage tanks and/or use or storage of chemical materials indicate that the entire City is subject to chemical spills or accidents, thereby illustrating its inappropriateness for future residential development.

In summary, Vernon's prolonged history as an industrial City has resulted in significant background contamination. Industrial uses which store or use hazardous materials are pervasive throughout the City. These conditions make Vernon a highly unsuitable environment for sensitive land uses such as housing.

Noxious Odors

Vernon has numerous industries which generate noxious odors, primarily related to the slaughtering and rendering of animals. Overlay districts have been designated in the City's General Plan

in attempts to isolate the locations of offensive industrial uses responsible for excessive noise and odors. These overlay districts include a "Slaughtering Overlay" for uses which involve the slaughtering of animals, and a "Rendering Overlay" for the location of rendering facilities, fertilizer facilities, and junk yards. These uses generate significant adverse effects related to odor and noise, making residential land uses highly incompatible within their vicinity.

Noise

As could be expected in a highly industrial city, Vernon is exposed to high levels of noise emanating from stationary industrial activity, as well as from trucks, automobiles, and railroad operations. Numerous companies in the City operate equipment, such as large presses and pumps, which produce excessive vibrations and generate noise well beyond the level of acceptability for noise-sensitive land uses within the vicinity. Arterial roadways in Vernon have a very high proportion of truck traffic (approximately 30%), thereby intensifying noise levels surrounding the City's roadways. In addition, four main railroad lines and a number of switching operations pass through the City, generating significant levels of noise.

Figure H-3 derived from the Noise Element presents noise contours developed for Vernon in 1986; existing conditions are virtually the same. The 60 dB CNEL contour and higher represents the Noise Referral Zone adopted by the City for which any proposed land use within the zone shall be evaluated on a project specific basis. The City's policy is that residential development in areas between 60 and 65 CNEL should be undertaken only after detailed analysis of the noise reduction requirements are made and necessary noise insulation features in the project's design are determined. In areas where noise levels exceed 70 CNEL (those areas bordered on more than one side by 65 CNEL contours), residential development should be discouraged. As evidenced by the contour map, a large portion of the City falls within the Noise Referral Zone, and is thereby only marginally acceptable for sensitive land uses such as housing. The noise contours are based on roadway traffic, and do not account for stationary noise sources. The probability is that areas mapped as being outside the 60 dB CNEL may in fact experience excessive noise levels from intermittent or other sources.

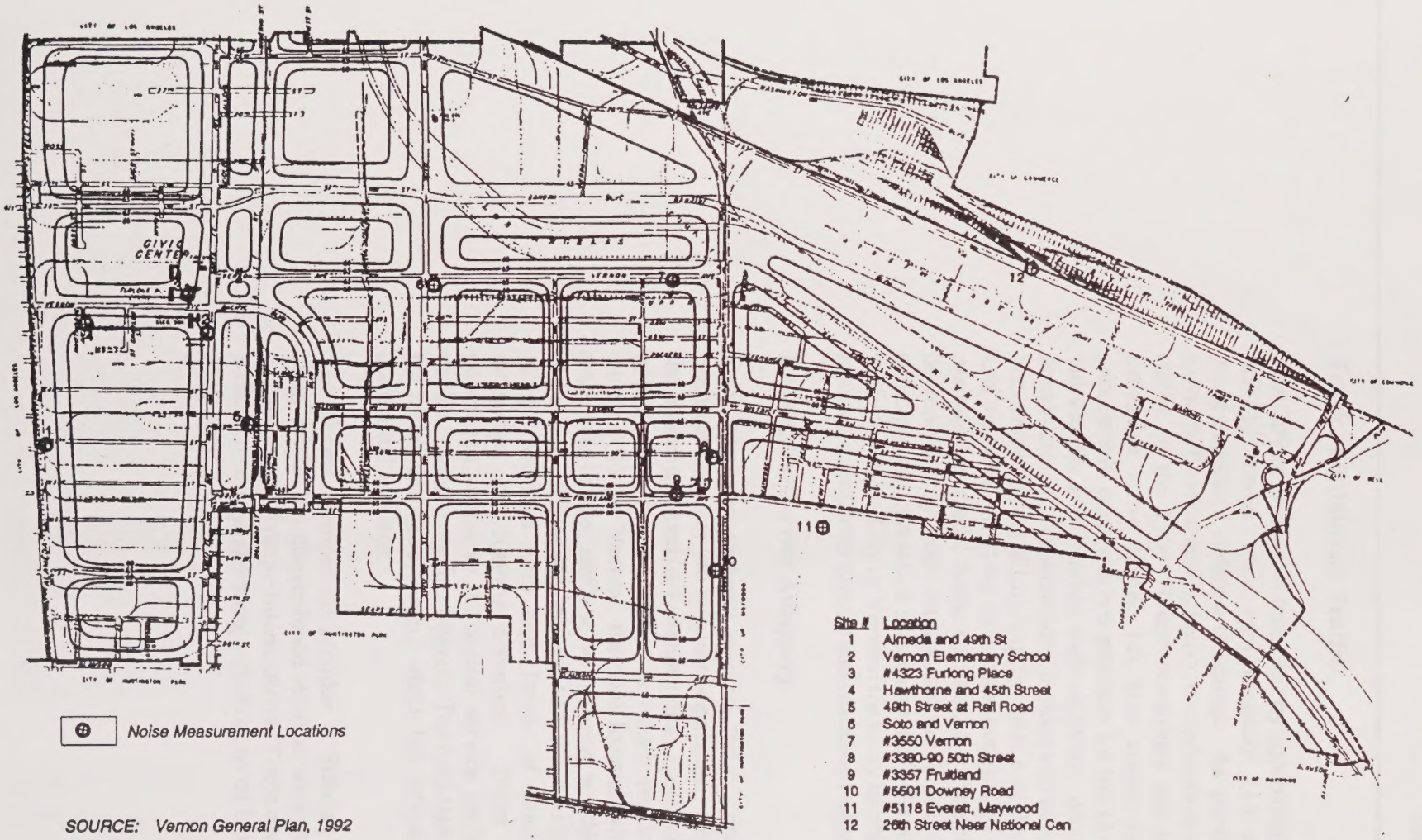


Figure H-3
Noise Contour Map

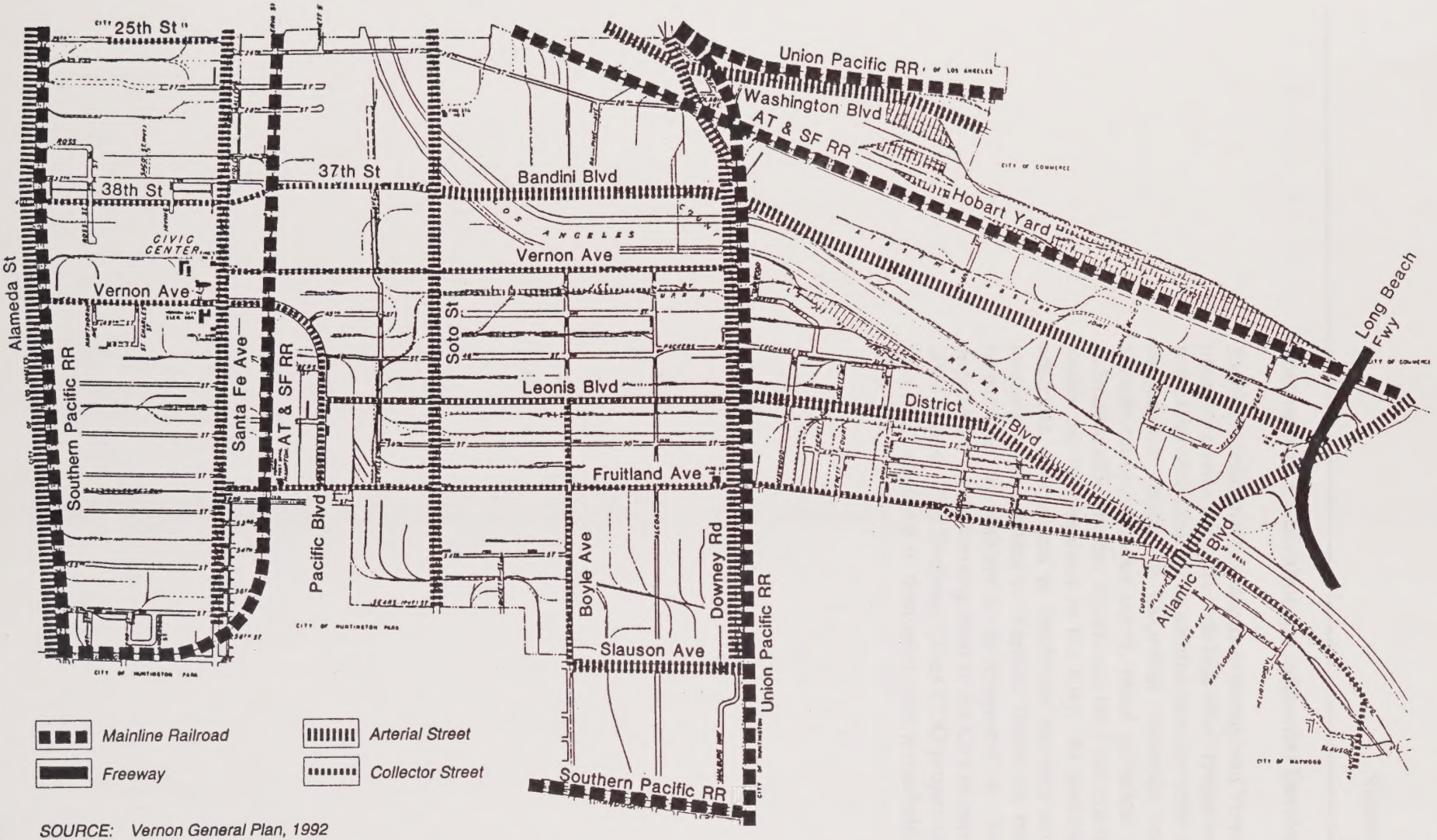
Truck and Railroad Traffic

The City of Vernon is traversed by approximately 137 miles of railroad tracks, with approximately 114 at-grade and one grade-separated railroad crossings. As previously mentioned, truck traffic is extremely heavy, comprising nearly one-third of all traffic in the City. These conditions not only contribute to excessive noise levels, but also create safety hazards for pedestrians, particularly a problem for the elderly, handicapped individuals and families with children. Although the planned construction of the Alameda Corridor will consolidate rail traffic between the Ports of Los Angeles and Long Beach and downtown Los Angeles, no plans have been announced to vacate existing mainline railroads. Some spur tracks will be eliminated, but will be replaced by truck transportation. Figure H-4 indicates the principal transportation elements which contribute to noise and pollution in the City of Vernon: the Long Beach Freeway, arterial roadways, collector streets and mainline railroads.

Residential Service Adequacy

Residential development requires the provision of services to meet the needs of the resident population. Services provided at the municipal level include education, recreation, and local retail goods and services. While few such residential services are situated within Vernon, they are located within close enough proximity to adequately serve potential residential development in the City. However, access to these residential services is along roadways with high levels of truck traffic, railroad crossings, and loading activities. These conditions make pedestrian access to residential service facilities difficult and unsafe, particularly for children. The City lacks any area suitable for residential development which has safe access to necessary residential services.

The closest commercial corridor is Slauson Boulevard to the south which has convenience retail as well as community retail nodes located at major intersections. These commercial areas are located in the neighboring jurisdictions of Huntington Park and Maywood.



SOURCE: Vernon General Plan, 1992

Figure H-4
Major Transportation Corridors

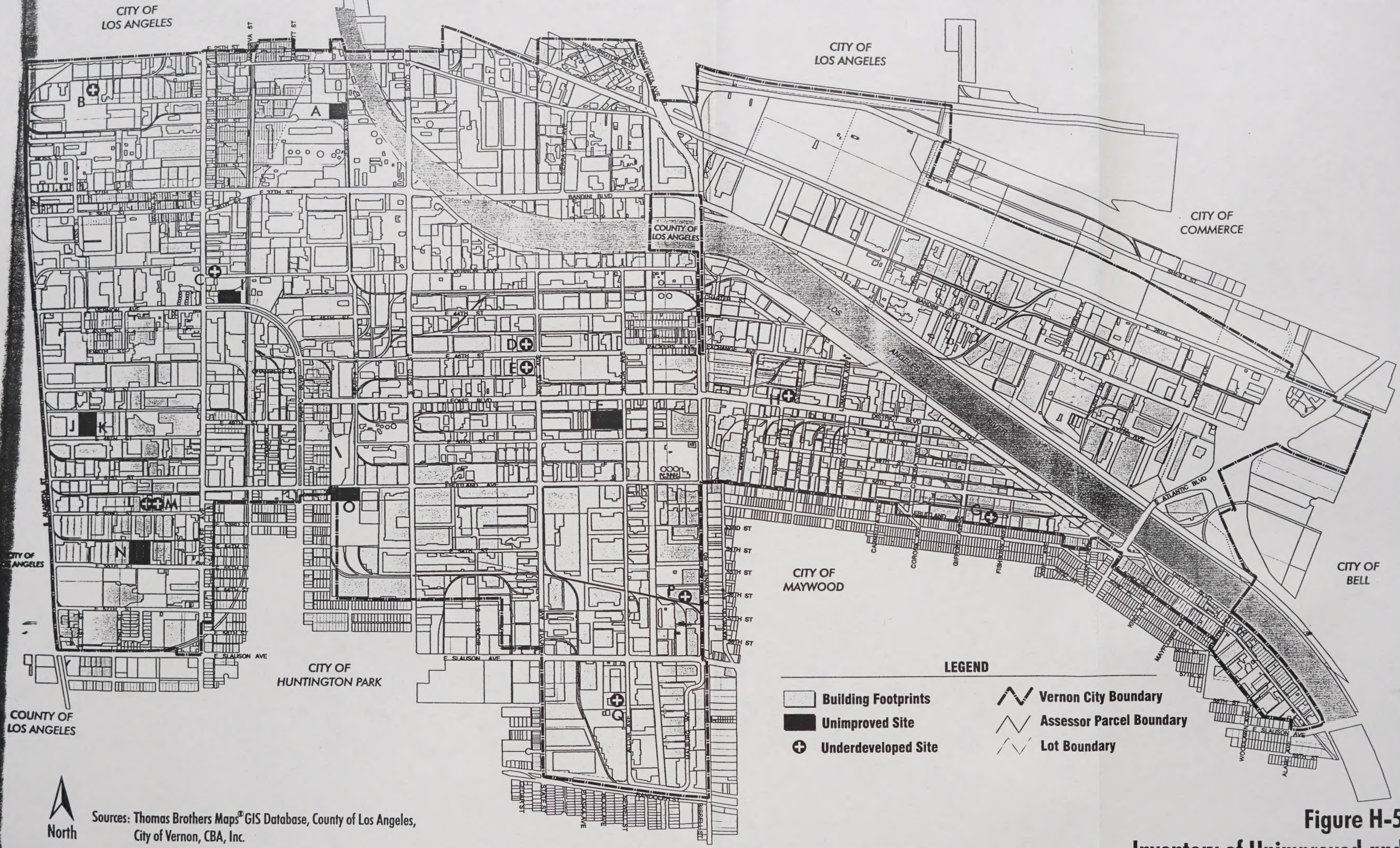
Summary of Constraints to Residential Development

Extensive industrial development throughout Vernon has resulted in severe environmental conditions which render virtually any site in the City unsuitable for residential development. Environmental degradation related to hazardous materials and background contamination, noxious odors, noise pollution and truck and railroad traffic present significant land use conflicts for future residential development in the City. In addition, the lack of adequate, safe access to residential services acts to constrain housing opportunities in Vernon. Based on these significant constraints to residential development in Vernon, SCAG approved a future housing need in the City of zero for the 2000-2005 period. The Gateway Cities COG projections through the year 2025 continue to document zero household growth in the City.

2.3 Housing Opportunities

In order to assess the current potential for residential development, the City worked with a local real estate broker to identify properties within the City listed as unimproved (currently vacant lots) and underdeveloped (currently vacant buildings). From this list, the City's recently-developed land use data base was used to select sites that offer relatively better potential for environmental safety and adequate residential services. The remaining sites were eliminated from further consideration on the basis of their location on principal truck or rail routes, or in overlay districts for slaughterhouse or rendering, or because of their small size (less than one acre).

A total of 17 unimproved and underutilized sites were considered to have some limited potential for residential development. These sites are described in Tables H-5 and H-6, and specifically identified as letters A-Q in Figure H-5. The following discussion evaluates these sites in terms of economic feasibility, environmental safety, and residential service adequacy.



Sources: Thomas Brothers Maps® GIS Database, County of Los Angeles, City of Vernon, CBA, Inc.

Figure H-5
Inventory of Unimproved and Underutilized Sties in Vernon

Table H-5
Characteristics of Unimproved and Underutilized Sites in Vernon
November 2000

Site No.	Assessor Parcel Number	Location	GP Designation	On-Site Hazardous Materials [1]	Site Area Improvements	
					(Acres)	Type
A	6302-002-023	2550 East 28th Street	General Industrial	no	1.57	Parking Lot
B	6302-009-026	1921 East 27th Street	General Industrial	3,991.25	2.09	Vacant Bldg.,Truck Terminal
C	6302-018-017	3876 Santa Fe Avenue	Commercial/ Industrial	no	2.97	Vacant Bldg.,Apparel
D	6303-015-002	3051 East 46th Street	General Industrial	223,652.6	2.23	Vacant Bldg.,Wholesale
E	6303-021-005	4601 Boyle Avenue	General Industrial	no	2.57	Vacant Bldg.
F	6303-025-022	4911 Alcoa Avenue	General Industrial	no	3.17	Vacant Lot
G	6304-012-002	4833 Fruitland Avenue	General Industrial	no	1.58	Vacant Bldg.,Truck Terminal
H	6304-022-022	4555 Everett Avenue	General Industrial	no	1.03	Vacant Bldg.
I	6308-006-009	4400 Block of Pacific Blvd.	Commercial/ Industrial	1,506.18	1.59	Vacant Lot
J	6308-015-073	2300 Block of 49th Street	General Industrial	no	1.23	Vacant Lot
K	6308-015-074	2035 East 49th Street	General Industrial	no	1.21	Vacant Lot
L [2]	6308-016-012	2305 East 52nd Street	General Industrial	no	0.52	Vacant Bldg.
M [2]	6308-016-013	2315 East 52nd Street	General Industrial	no	0.94	Vacant Bldg.

Map No.	Assessor Parcel Number	Location	GP Designation	On-Site Hazardous Materials (1)	Site Area Improvements	
					(Acres)	Type
N	6308-016-900	1900 Block of 55th Street	General Industrial	no	2.77	Vacant Lot
O	6309-026-013	2700 Fruitland Avenue	General Industrial	no	2.09	Vacant Lot
P	6310-002-031	5601 Downey Road	General Industrial	no	3.58	Vacant Bldg., Fabric Mill
Q	6310-027-026	5991 S. Alcoa Avenue	General Industrial	2,310.37	2.11	Vacant Bldg., Fabric Mill

(1) Hazardous materials on-site is measured in maximum daily volume (lbs)

(2) Sites "L" and "M", both under an acre in size are included on the list because the two parcels are adjacent to each other on East 52nd Street.

Source: Cotton/Beland/Associates, Inc.

Table H-6
Locational Characteristics of Unimproved and Underutilized Sites in Vernon
November 2000

Site No.	Surrounding Land Uses	Truck Traffic	Noise	Odor	Railroad Hazards	Waste Hazards	Nearby/Onsite Sources of Toxic Material
A	Truck Terminal, Edible Fats Production	Low	High	High	Low	High	Nearby Underground Storage Tank. Acetylene, Sulfic Acid
B	Concrete Plant, Apparel	Low	Mod	Low	Mod	High	On-Site Contamination. Nearby Underground Storage Tank. Motor Oil, Ripe-Rite Concentrate, Diesel #2
C	Apparel, Truck Repair	High	High	Mod	Low	High	Nearby Underground Storage Tank. Solvent, Adhesive Cleaner, and Antifreeze/Coolant
D	Pharmaceutical Preparations, Distillery, Truck Terminal	Low	High	Mod	Mod	High	On-Site Gasoline Contamination from Historic Presence of Large Above-Ground Gas Tanks. Motor Oil, Liqu-A-Klor, Isopropanol
E	Home furnishings, Industrial Supplies	Low	Low	Mod	Mod	Mod	Large Above-Ground Gas Tanks in Area - Likely Probability of On-Site Contamination. Motor Oil, Oven Cleaner, Wilflex Dispersion Pigment
F	Fabric Mill, Steel Wholesale	Low	Mod	Low	Mod	High	On-Site Hydrocarbon Contamination. Reducer Solvent
G	Trucking Storage, Electrical Appliances	Mod	Mod	Mod	Mod	High	Propane
H	Photography Equipment, Metal Services	Mod	Low	Mod	Mod	High	Gasoline
I	Toy Supplies, Truck Repair	Mod	High	Mod	High	High	On-Site Contamination. Acetone, Antifreeze/Coolant, Sulfric Acid, Molub-Alloy Oil
J	Apparel, Food Preparation, Furniture	Low	Low	High	Mod	High	Welding Acetylene, Propane, Formula C
K	Apparel, Food Preparation, Furniture	Low	Low	High	Mod	High	Welding Acetylene, Propane, Formula C
L	Fabric Mill, Wines, Warehouse	Low	Mod	Mod	Mod	High	Propane
M	Fabric Mill, Wines, Warehouse	Low	Mod	Mod	Mod	Mod	Hydraulic Oil, Sodium Persulfate
N	Apparel, Fabric Mill, Recycling Plant	Low	Mod	Mod	Mod	Mod	Power Coat Paints, Knitting Oil
O	Apparel, Home furnishings, Train Junction	High	High	Mod	High	High	Kleen Solvent, Diesel Fuel #2
P	Hardware, Metalworks, Oils	High	High	Mod	High	Mod	Caustic, CA 527/OLOA 864
Q	Prepared Food, Gas Station, Metalwork	Low	Mod	Mod	Low	High	On-Site Contamination. Nearby Underground Storage Tank. Propane, Dual Heat, Sodium Hypochlorite

Mod. = Moderate

Economic Feasibility

Based upon information regarding the Vernon commercial and industrial market, recent (2000) land sales for large industrial sites have been priced at approximately $10 to $14 per square foot, depending on location, soil condition and necessary demolition costs. Effective land cost including remediation required to make old industrial sites developable for residential use could be significantly higher. Additional costs incurred to make any of the sites suitable for residential development would include testing for ground contamination, remediation for residential development, and providing minimum safety and nuisance improvements to meet residential development requirements. Although additional costs might be feasible if the sites were otherwise suitable for residential development, the environmental problems from surrounding uses are so severe as to virtually preclude both private market and assisted housing development on the sites.

Environmental Safety

Environmental conditions in Vernon are generally incompatible with residential uses. As indicated in Table H-6, the17 potential residential development sites in Vernon all have some form of negative environmental condition.

The surrounding land uses at the sites analyzed include pharmaceutical preparations, fabric mills, metal services, food preparation, truck terminals, and warehouses. Although these sites were selected as having relatively less transportation hazard than sites that were eliminated from further consideration, three of the 17 sites are exposed to high truck traffic due to their location on arterial roads. Three sites are exposed to moderate truck traffic. Noise hazard for these sites is directly related to truck and rail operations. Six of the 17 sites are exposed to relatively high noise levels and seven sites to moderate noise levels.

Three of the selected sites have relatively high levels of noxious odors from adjacent food preparation facilities. The remaining sites have low to moderate levels of noxious odors. Three sites have relatively high rail hazards: two due to proximity to main line train tracks and one near a train junction. Rail spurs are found throughout the City of Vernon and eleven sites were determined to have moderate rail hazard from proximity to less active or spur rail lines.

City, State and Federal records indicate that thirteen of the potential housing sites are exposed to significant levels of hazardous waste from underground tanks, soil contamination and chemicals used for operations in the adjacent area. Four of the sites were assessed to be exposed to moderate levels of waste hazards associated with business operations in the surrounding area. The presence of hazardous materials and hazardous waste is evident throughout the City. Six hazardous waste treatment facilities are located within Vernon. A total of 50 sites have regulated substances containing extremely hazardous materials. If a leak were to occur at any of these 50 sites, evacuation would be required for a 1/4 mile area around the facility.

Based on the preceding analysis of surrounding land use, truck traffic, noise, odor, rail and waste hazards, Sites E and F have the fewest environmental constraints for potential residential development. Residential services (schools, parks, retail) are approximately 1.4 miles or less away from these sites. However, both sites are close to spur rail lines and are surrounded by industrial land uses including a fabric mill, home furnishings, industrial supplies, and a steel wholesale supplier. These factors make both sites unsuitable for new residential development.

The associated truck traffic, noise, odor, and waste hazards make all of these sites less than desirable locations for residential uses. All of these sites have potential ground contamination problems and are within close proximity of hazardous materials, making these sites extremely hazardous to potential residents.

The development of residential uses at sites within this industrial environment would create both hardship and hazards for residents substantially greater than those experienced in nearby residential neighborhoods in neighboring communities, and at levels of environmental risk unacceptable for new residential development.

Residential Service Adequacy

Residential development in the City of Vernon would require that the new residents be provided basic residential services. The services provided at the local level include education, recreation and retail goods and services. The estimated distances to these facilities from each site are presented in Table H-7. The closest commercial corridor is Slauson Boulevard to the south which has convenience retail as well as community retail nodes located at major intersections. These service commercial areas are located in the neighboring jurisdictions of Huntington Park and Maywood.

Table H-7
Residential Service Characteristics of Unimproved and Underutilized Sites in Vernon
November 2000

Site No.	Assessor Parcel Number	Location	Nearest Elem. School	Nearest J. H. School	Nearest High School	Nearest Retail	Nearest Park/Rec
A	6302-002-023	2550 East 28th Street	0.6 mi.	2.0 mi.	1.8 mi.	1.6 mi.	1.2 mi.
B	6302-009-026	1921 East 27th Street	0.6 mi.	1.7 mi.	1.1 mi.	1.7 mi.	0.9 mi.
C	6302-018-017	3876 Santa Fe Avenue	0.5 mi.	1.9 mi.	1.2 mi.	1.3 mi.	0.8 mi.
D	6303-015-002	3051 East 46th Street	0.9 mi.	1.5 mi.	0.9 mi.	1.1 mi.	1.2 mi.
E	6303-021-005	4601 Boyle Avenue	1.2 mi.	1.4 mi.	0.8 mi.	1.0 mi.	1.1 mi.
F	6303-025-022	4911 Alcoa Avenue	0.7 mi.	1.2 mi.	0.8 mi.	1.2 mi.	0.7 mi.
G	6304-012-002	4833 Fruitland Avenue	0.4 mi.	0.7 mi.	1.4 mi.	0.5 mi.	0.7 mi.
H	6304-022-022	4555 Everett Avenue	0.7 mi.	1.0 mi.	1.3 mi.	1.2 mi.	0.6 mi.
I	6308-006-009	4400 Block of Pacific Blvd.	0.2 mi.	1.7 mi.	1.2 mi.	1.1 mi.	0.7 mi.
J	6308-015-073	2300 Block of 49th Street	0.4 mi.	1.6 mi.	1.3 mi.	0.8 mi.	0.5 mi.
K	6308-015-074	2035 East 49th Street	0.4 mi.	1.6 mi.	1.3 mi.	0.8 mi.	0.5 mi.
L	6308-016-012	2305 East 52nd Street	0.6 mi.	1.4 mi.	1.1 mi.	0.6 mi.	0.8 mi.
M	6308-016-013	2315 East 52nd Street	0.6 mi.	1.4 mi.	1.1 mi.	0.6 mi.	0.8 mi.
N	6308-016-900	1900 Block of 55th Street	0.4 mi.	1.3 mi.	0.9 mi.	0.6 mi.	0.6 mi.
O	6309-026-013	2700 Fruitland Avenue	0.6 mi.	1.1 mi.	0.6 mi.	0.5 mi.	1.1 mi.
P	6310-002-031	5601 Downey Road	0.3 mi.	0.6 mi.	0.7 mi.	1.1 mi.	0.2 mi.
Q	6310-027-026	5991 S. Alcoa Avenue	0.3 mi.	0.6 mi.	0.3 mi.	0.7 mi.	0.7 mi.

From the standpoint of residential development, Sites G, P, and Q are situated close enough to the boundary of adjacent residential districts to provide relatively adequate residential services. However, the proximity to rail lines and nearby hazardous waste contamination (Site Q also has on-site contamination) makes these sites unsuitable for residential development. In addition to the substantial distances from the potential sites to residential services, access to residential service facilities from the potential residential sites are along roadways with high truck traffic, railroad crossings, and loading activities. These conditions make pedestrian access to residential services difficult for adults and unsafe for children.

Summary of Housing Opportunities

To summarize, analysis of 17 unimproved and underutilized sites indicates that no site in Vernon is suitable for residential development. The presence of hazardous materials at sites throughout the City as well as pervasive danger from truck and rail transportation routes--hallmarks of Vernon's industrial character--provide an undesirable environment for residential development. In spite of any subsidy which might be provided for assisted housing, Vernon remains unsuitable for new housing development.

Future residential development is inappropriate in Vernon. As reflected by the City's RHNA of zero future housing units and the Gateway Cities COG projections of zero housing growth, opportunities for residential development in Vernon are significantly constrained due to its pervasive industrial character. Nonetheless, additional residential development will not be precluded in Vernon. The Housing Element must address the maintenance of the units that currently exist in Vernon and the addition of any ancillary units required to support public safety personnel and local industry. Major environmental constraints preclude other types of housing.

3.0 GOALS, POLICIES AND PROGRAMS

The major focus of housing policy in Vernon is to preserve the existing housing stock in the City and to insure that housing in the City is well maintained. The goals and policies of the Housing Element are concerned with emphasizing the need for safe and sound housing in the City. The primary goal of the Housing Element concerns the safety and maintenance of all dwelling units.

The Housing Element also recognizes the occasional need for a plant to have a full time caretaker, watchman, or key employee residing on-site. The goals and policies encourage this use as long as the dwellings are necessary to the operation and meet all applicable building and zoning codes.

The Housing Element is concerned about the health and safety of residents living on or adjacent to plant sites. The goals and policies discourage the occupation or construction of dwelling units on industrial sites where activities are involved in operations potentially hazardous to residents. In addition, all units are required to have adequate insulation and air conditioning to reduce potentially adverse air quality and noise related impacts from the adjacent industrial uses.

3.1 Goals and Policies

GOAL 1 **MAINTAIN A SUFFICIENT NUMBER OF DWELLING UNITS TO ACCOMMODATE PUBLIC SAFETY PERSONNEL AND KEY EMPLOYEES OF INDUSTRY.**

POLICY 1.1: Continue to provide housing for persons involved in or concerned with public safety or local industry in the City.

POLICY 1.2: Provide for the retention of existing residential units in the City which are economically and physically sound.

POLICY 1.3: Continue to permit residential development within the City's industrial and commercial zones provided that existing environmental constraints, e.g., noise, odor, hazardous waste, can be mitigated to an acceptable level.

GOAL 2 **ENSURE THAT ALL HOUSING UNITS ARE MAINTAINED IN DECENT, SAFE AND SANITARY CONDITION.**

POLICY 2.1: Continue to enforce all relevant building and zoning codes to ensure that all residential units are adequately maintained.

POLICY 2.2: Encourage the separation of residential units from industrial operations or storage areas which are potentially hazardous to the health and safety of their occupants.

POLICY 2.3: Require all residential units to be equipped with air conditioning and sound insulation in new construction or as part of any remodeling work to protect residents from exposure to adverse environmental conditions.

POLICY 2.4: Mitigate any residential displacement impacts occurring as a result of residential demolition through unit replacement or relocation of tenants.

GOAL 3 **PROMOTE THE CONTINUED AVAILABILITY OF A RANGE IN UNIT TYPES AND SIZES AVAILABLE REGARDLESS OF INCOME, RACE OR ETHNIC BACKGROUND.**

POLICY 3.1: Prohibit discrimination in the availability of housing, and prosecute anyone found guilty of practicing housing discrimination.

3.2 Programs

As discussed in this Element, residential development is unlikely in Vernon due to the City's pervasive industrial character. SCAG adopted a future housing need of zero in Vernon as part of the 2000 Regional Housing Needs Assessment, recognizing the incompatibility of locating housing in such a heavy industrial environment. The Gateway Cities GOG has continued to project zero housing growth in Vernon through the year 2025. As such, programs to increase the City's housing stock are not appropriate. As indicated in the goals and policies, the primary goal of the Housing Element is to ensure the maintenance of the City's existing housing stock. The following two programs will implement this goal.

Maintenance of City-Owned Residences

The City owns 26 of the total 31 housing units in Vernon; these city-owned units are rented to public safety personnel to ensure the availability of safety personnel in case of emergency. The City is responsible for the maintenance and upkeep of these units. As indicated in the housing conditions survey (refer to Section 2.1 of the Housing Element), all of the City-owned units were determined to be in good repair. The City will continue to provide maintenance to these units, thus ensuring upkeep for the majority of Vernon's housing stock.

Code Enforcement

Of the five non-City owned units located in Vernon, none was determined by the housing conditions survey to be in need of substantial rehabilitation. Due to the limited number of privately-owned units in the City, a code enforcement program would have limited application. However, it is nonetheless imperative that residential units be adequately maintained, particularly those integrated with industry, to minimize potential environmental hazards. The City will, as required, undertake code enforcement activities on Vernon's few privately-owned units to ensure the health and safety of City residents.

Preservation of Assisted Housing

State law (Chapter 1451, Statutes of 1989) requires the City to identify, analyze and propose programs within the Housing Element to address the potential conversion of all federal, State and locally assisted housing developments eligible to change to non-low-income use during the next ten-year period (1996-2006).

Government Code Section 65583(8) defines assisted housing developments as the following: "multi-family rental housing that receives governmental assistance under federal programs listed in subdivision (a) of Section 65863.10, state and local multi-family revenue bond programs, local redevelopment programs, the federal Community Development Block Grant Program, or local in-lieu fees. Assisted housing developments shall also include multi-family rental units that were developed pursuant to a local

inclusionary housing program or used to qualify for a density bonus pursuant to Section 65915-65917."

Vernon has no assisted housing in its jurisdiction, as confirmed by City and State HCD staff, and through review of "Inventory of Federally Subsidized Low-Income Rental Units at Risk of Conversion" (California Housing Partnership Corporation), and the "Use of Housing Revenue Bond Proceeds - 1994" (California Debt Advisory Commission). As a result, there is no housing at risk of losing its subsidized status which must be considered in the Housing Element.

3.3 Redevelopment Agency Housing Requirements

The Vernon Redevelopment Agency adopted a Redevelopment Plan for the Industrial Redevelopment Project Area in November 1990. The properties included in the approximate 1,988-acre Project Area were those which exhibited the worst blighting conditions and which were in need of public assistance to ameliorate the problems. The Project Area containes a mix of established industrial uses, including food processing, warehousing, manufacturing, truck terminals, and slaughtering and rendering operations. In 1998, the Industrial Redevelopment Project Area was amended to include an additional 137 acres of land, divided into 30 parcels. These parcels are predominantly used for industrial purposes, with significant portions also being used for parking and storage. Four housing units are located within the Project Area, two of which are owned by the City, with no additional housing proposed. The Redevelopment Agency has no plans to demolish or relocate the two privately owned housing units in the Project Area.

Pursuant to the Community Redevelopment Reform Act of 1993 (AB 1290), the Vernon Redevelopment Agency adopted a five-year Redevelopment Implementation Plan for the 2000-2004 period. This Plan updated the Agency's goals, objectives, and programs from the previous Implementation Plan adopted in 1994. One of the components of the Plan is to detail the Agency's responsibilities under redevelopment law to increase and improve the supply of low and moderate income housing. The following section summarizes the Vernon Redevelopment Agency's responsibilities with regard to housing production, housing replacement, and expenditures for low and moderate income housing from its Implementation Plan.

Housing Production Requirements

Legislative Requirements

Health and Safety Code Section 33413(b)(1) requires that 15 percent of all housing developed or substantially rehabilitated within a project area and without assistance from a redevelopment agency, must be affordable to low and moderate income households, 40 percent of which must be affordable to very low income households. Section 33413(b)(2) requires that 30 percent of all housing developed or substantially rehabilitated with an agency's assistance, must be affordable to low and moderate income households, 50 percent of which must be affordable to very low income households.

Existing Housing Production in Project Area

City records indicate that the housing stock within the Vernon Project Area has undergone a decrease of one dwelling unit since 1990, leaving a total of only four units. No housing has been added in the Project Area by either the Redevelopment Agency or any other private or public entity.

Projected Housing Production Requirements

The City of Vernon has no existing or future housing production requirement as defined in Section 33413(b) of the Health and Safety Code. Because the Redevelopment Plan calls for neither the construction, destruction, or replacement of any housing within the Project Area, the Agency does not anticipate any housing production requirement during the five-year Implementation Plan period, or in the future.

Housing Replacement Requirements

Legislative Requirements

When residential housing units affordable to low and moderate income households are demolished, destroyed, or otherwise made unaffordable to households at these income levels, as part of a redevelopment project, the agency must replace those units within four years (*H&S Code § 33413(a)*).

The replacement housing obligation is only triggered when the units destroyed or removed are subject to a written agreement with the redevelopment agency or have been financially assisted by the agency. Destroyed units which were vacant but would reasonably be expected to be occupied by low and moderate income households if occupied, must also be replaced. Replacement units may be located anywhere within the territorial jurisdiction of the agency.

Existing Replacement Housing Obligation

Within the Vernon Project Area, one housing unit has been destroyed or removed from the housing market since the Project Area was adopted in 1990. This housing unit was not destroyed or removed as a result of any Redevelopment Agency activity or agreement. In 1990 there were five housing units within the Project Area boundaries, and there are currently four units remaining.

Anticipated Removal of Units During Five-Year Plan

No units are anticipated to be removed as a part of any redevelopment activity of the Vernon Redevelopment Agency during the 2000-2004 Implementation Plan period.

Projected Housing Replacement Requirements

The Agency should not have, nor should it incur during its five-year Implementation Plan, any replacement housing obligation as defined under Section 33413(a) of the Health and Safety Code.

The Agency has adopted a detailed plan and method for the relocation of any resident displaced by redevelopment activity and the replacement of any affordable housing that might be destroyed. Section V of the Report to Council and Section 450 of the Redevelopment Plan set forth the procedures the Agency will follow, should any resident be displaced by redevelopment activities. Additionally, if the Agency executes any agreement which would cause the removal of any low or moderate income housing, the Agency must adopt a comprehensive replacement housing plan within 30 days of the agreement, and the plan must comply with the requirements of Section 33413 of the Health and Safety Code (*see Section V, Proposed Industrial Redevelopment Project -- Report to Council*).

Redevelopment Housing Set-Aside Requirements

Legislative Requirements

Sections 33334.2 through 33334.6 of the Health and Safety Code require redevelopment agencies to set-aside 20 percent of the tax increment revenues generated by a project area to a special Low and Moderate Income Housing Fund (Low/Mod Fund). The Low/Mod Fund must be used to "increase, improve and preserve the community's supply of low and moderate income housing" within the territorial jurisdiction of the agency (*H&S Code § 33334.3(c)*).

The Community Redevelopment Law, however, contains several exceptions to the 20 percent set-aside requirement. Section 33334.2 contains three specific exceptions, which if any one of

them applies, exempts the agency from depositing all or part of the required monies in a Low/Mod Fund for a given year. The exceptions contained in 33334.2 were also incorporated into Section 33334.6.

A redevelopment agency need not set-aside tax increment for Low and Moderate Income Housing if it can make the following finding:

> (1)(A) That no need exists in the community to improve, increase, or preserve the supply of low- and moderate-income housing, including housing for very low income households in a manner which would benefit the project area and that this finding is consistent with the housing element of the community's general plan . . . including its share of regional housing needs of very low income households and persons and families of low or moderate income. (*H&S Code § 33334.2*).

The 2000-2005 Vernon Housing Element continues to document that the City of Vernon has no existing housing need. SCAG has adopted a Zero Regional Housing Needs Assessment (RHNA) for Vernon for the 2000-2005 period. The Gateway Cities Council of Governments (COG) Subregion projections through the year 2025 continue to indicate zero housing growth in the City. As discussed above, there are only four housing units within the Project Area boundaries. Two of these units are owned by the City and occupied by City safety personnel; the remaining two are privately owned. Because of Vernon's heavy concentration of industrial uses and the concomitant environmental and social concerns, Vernon is not suited for housing development of any kind. The existing housing within the City is there only by necessity.

The Vernon Redevelopment Agency has adopted resolutions making such findings in 1991, 1992, 1993, 1994, 1995, 1996, 1997, 1998, and 1999. The Agency expects to be able to adopt similar resolutions annually with the appropriate findings exempting the Agency under Section 33334.2(1)(A) of the Health and Safety Code, supported by the City's Housing Element, for the foreseeable future.

Redevelopment Housing Set-Aside Fund Projections

Because the Agency has determined there to be no need, and expects to continue to be able to adopt such findings to relieve the Agency from depositing money in an Low/Mod Fund under Section 33334.2(1)(A) of the Health and Safety Code, there are no existing or projected housing set-aside funds for the Industrial Redevelopment Project Area.

APPENDIX

Correspondence From
U.S. Bureau of the Census

...ARTMENT OF COMMERCE
...Bureau
...Washington
OFFICE OF THE DIRECTOR

June 23, 1993

From the Acting Director
Bureau of the Census

This is an official statement of the revised 1990 census population and housing unit counts for Vernon city, California, including corrections made through June 8, 1993.

According to the official returns of the TWENTY-FIRST DECENNIAL CENSUS OF THE UNITED STATES, on file in the Bureau of the Census, the counts as of April 1, 1990 for Vernon city, California are:

Population	82
Housing Units ...	30

Harry A. Scarr

This statement is being sent to the highest elected official of this governmental unit, the Secretary of State, and other state officials.

Census counts used for Congressional apportionment and legislative redistricting and 1990 census data products will remain unchanged. The Census Bureau will show the corrections in a supplemental user note.

If you require additional information, please call the Census Bureau on (301) 763-4894. Please refer to document number 22200626-06-000-000-3006-0000-02.

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